

Applicant's independent claim 1, recites an image signal transmitting apparatus for transmitting image signals stored in an image acquiring system or storage system to an image signal receiving center for processing the image signals. The image signal transmitting apparatus includes a function selection panel, a receiving unit, a controller, and a transmitting unit. The function selection panel has a multiple key keypad for entering transmission signals by a user. The receiving unit has a transmission interface through which it receives the image signals from the image acquiring system or storage system. The controller receives the image signals from the receiving unit and the transmission signals entered by the user through the function selection panel, and controls the sending of the image signals. The transmitting unit coupled to the controller sends the image signals to the image receiving center at a remote location according to the transmission signals.

In contrast, *Kotani* discloses a communication apparatus including a plurality of remotely-controlled image transmitting terminals (20) and a monitoring terminal (60). The image transmitting terminal is used in combination with a video camera (10). The monitoring terminal (60) serves to transmit a control signal for the video camera (10) through a network (100) to the image transmitting terminal (20). The image transmitting terminal (20) controls the video camera (10) according to such control signal and returns the resulting state of the video camera (10). In the software 410 of the monitoring terminal (60), there are installed a camera client (411) for remotely controlling the camera and image receiving software (412) for decompressing and displaying the image data (column 4, lines 1-5 and, 36-41; Figure 1 and Figure 2).

Most significantly, *Kotani* discloses that **the actual image transmission is made by request from the image receiving software (412)** (column 6, lines 7-8). That is, the action of transmitting an image signal is initiated by the monitoring terminal (60), which is at the **image receiving end**. This contrasts with the claimed invention in which the action of transmitting an

image signal is initiated by a user through the function selection panel of the image transmitting apparatus, which is at the **image transmitting end**. Thus, *Kotani* fails to disclose or suggest the claimed structure.

The cited secondary reference by *Saxena* is directed to a system for integrating communication programs in a computer through a graphical user interface that provides access to the diverse functions of the programs. *Saxena* fails to overcome the above deficiencies of *Kotani* as explained below.

The Examiner acknowledges that *Kotani* fails to disclose the use of a function selection panel with multiple keypads and a transmission interface through which image signals are received. The Examiner points to *Saxena* as teaching a user interface including keypads (420) displaying alphanumeric keys, and the use of a universal serial bus (USB), stating with reference to Figure 4 and column 5, lines 32-45, that both features are applicable to an integrated communications center.

In response, applicant would respectfully disagree with the Examiner's position that a person of ordinary skill in the art would find it obvious to combine the above teaching of *Saxena* with those of *Kotani*. There is no suggestion by *Kotani* or *Saxena* to combine their teachings in any way. That is, there is no suggestion of any usefulness in applying the teachings of *Saxena* to the communication apparatus of *Kotani*, which involves a monitoring terminal and a plurality of transmitting terminals.

Moreover, even if one were to apply *Saxena*'s keypad configuration along with the use of USB to *Kotani*'s communication apparatus, it is submitted that a person skilled in the art would most likely apply the keypad configuration and USB at the **monitoring terminal end** of the system, where actions in *Kotani*'s apparatus are initiated, not at the image transmitting terminal end, which transmits image signals in response to requests from the monitoring terminal. This follows from the fact that in *Kotani*'s apparatus the image transmission is made

by request from the image receiving software at the monitoring terminal end. Thus, even if the teachings of *Kotani* and *Saxena* were combined, the combination would not result in the claimed invention.

For at least the foregoing reasons, it is respectfully submitted that independent claim 1, as well as dependant claims 2-14, patentably distinguish the invention over the applied references, whether taken individually or in combination.

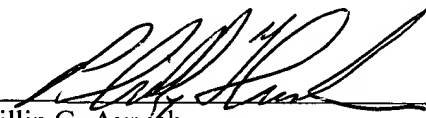
Claims 15 and 18 are independent system and method claims, which include limitations similar those of claim 1. It therefore is submitted that independent claims 15 and 18, as well as their respective dependant claims 16-17 and 19-20, are patentable over the applied references for at least the same reasons that the independent claims are patentable. As such, the rejection should be withdrawn.

Based on the above, it is respectfully submitted that this application is in condition for allowance and Notice of such, with allowed claims 1-20, earnestly is solicited.

Should the Examiner feel that a conference would be helpful in expediting the prosecution of this application, the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

Respectfully submitted,

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Date


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